Remarks

Claims 1-45 are pending. Claims 1, 9-15, 18, 26, 27, 30, 32, 38, 44 and 45 are amended herein. Reconsideration and allowance of the pending claims are respectfully requested by Applicants.

The status identifier for claim 32 is corrected to recite currently amended. Claims 30, 38, 44, and 45 are amended to correct clerical errors. No new matter is added.

In the Office Action Summary, subsection Application Papers, Line Item 10, the box indicating that the drawings are objected to has an 'X' entered therein.

The Office Action further states that Applicant may not request that any objection to the drawing(s) be held in abeyance. The Office Action also states that replacement drawing sheet(s) including the correction is required if the drawing(s) are objected to, in accordance with 37 CFR 1.85(a) and 37 CFR 1.12 1(d), respectively.

Respectfully, Applicant is unable to locate that section within the Office Action that explains the objections and to which figures that the objections may pertain.

Accordingly, Applicant has examined the formal drawings associated herewith and is unable to determine that which the Examiner finds objectionable.

Applicant respectfully requests further clarification regarding the objections to the drawings.

Claims 1-45 are rejected under 35 U.S.C. 103(a) as being unpatentable over Khalil et al., United States Patent Number 6,430,698 in view of Pickett, United States Patent Number 6,154,465. Applicants have reviewed the cited reference and respectfully submit that the embodiments of the present invention as recited in Claims 1-45 are patentable over Khalil in view of Pickett in view of the following rationale.

Independent Claims 9, 18, 26, 36 and 42 recite similar limitations. Claims 2-8 that depend from Claim 1, Claims 10-17 that depend from Claim 9, Claims 19-25 that depend from Claim 18, Claims 27-35 that depend from Claim 26, Claims 37-41 that depend from Claim 36 and Claims 43-45 that depend from Claim 42 provide further recitations of the features of the present invention.

Applicants respectfully direct Examiner to independent Claim 1 that recites an embodiment of the present invention.

Claim 1 recites:

A dynamic network address registration system, comprising:

a first device;

a second device, said first device and said second device adapted to communicate via a communications network; and

a controller coupled to said communication network, said controller adapted to store dynamic network address information for said first device therein, said controller adapted to store dynamic network address information for said second device therein, said controller further adapted to provide said address information of said second device to said first device such that a communication path can be efficiently established between said first device and said second device.

Thus, Applicant's invention is directed to a dynamic network address registration system for establishing communication between a first and second device in which neither device has an associated static address.

Khalil and the claimed invention are substantially different. Applicant understands Khalil to suggest a mobile node that may be a router and which map or may not change its point of attachment from one network to another in which the mobile node has a constant or fixed IP address (Col. 1, lines 43-47). Applicants respectfully assert that this is commonly referred to as a static IP address. As such, Khalil discloses a device, e.g., a router, having a static IP address.

As understood by Applicant, Khalil also suggests a mobile node that directly registers with a home agent in which the mobile node informs the home agent of its IP address, e.g., a registration request (Col. 3, lines 63-66). Thus, Khaiii discloses a mobile node informing a home agent, e.g., a controller, of its IP address. This teaches directly away from Applicant's invention, which is directed toward dynamic registration of dynamic network addresses and in which a controller stores dynamic network addresses and informs a mobile

node what the dynamic network (IP) address of another mobile node or home agent is or will be as recited in Claim 1. (Emphasis added.)

As understood by Applicant, Khalil further suggests one or more home agents, e.g., a router, that is on the mobile node's network (Col. 1, lines 47-48), each having an IP address that is known to all other home agents, e.g., a static IP address (Col. 7, lines 8-14). As further understood by Applicant, Khalil suggests a plurality of home agents, each having a known IP address, in which the plurality of home agents are encapsulated into a virtual home agent from the perspective of the mobile node (Col. 7, lines 11-1 8). Khalil further suggests that a heartbeat message is sent by a home agent to other home agents in which the network address of each home agent is known to the sending home agent.

However, Khalil docs not suggest, teach or describe a controller informing a first device of the network address of a second device, as recited in Claim 1.

Khalil suggests that a mobile node requests discovery of a home agent in which the mobile node includes its IP address in the request. Applicant respectfully asserts that Khalil discloses that the IP address of the mobile node is static (Col. 1, lines 43-46; Col. 2, lines 11 - 14). Khalil further suggests in Figures 14, 20, 21, and 22 that the mobile node that is requesting home agent discovery is required to furnish its static IP address. As such, Applicant respectfully asserts that the function and proper operation of Khalil is predicated upon a home agent receiving a discovery request from a mobile node in which the static IP address of the mobile node is paramount in initiation of the processes and functions described in Khalil. Moreover, the combination of Khalil in view of Pickett fails to suggest, teach or

describe the claimed embodiments because Pickett does not overcome the shortcomings of Khalil.

Pickett, as understood by Applicant, suggests voice and data communication in which a communication system 50 includes DHCP, a protocol that allows a server to assign dynamically IP addresses to particular computers (Col. 6 lines 37-41).

However, Pickett, as understood by Applicant, is silent as to the manner in which a dynamic IP address is assigned to a device, e.g., a router. As such, Applicant respectfully asserts that Khalil and Pickett, alone or in combination, do not suggest, teach or describe assigning dynamic IP addresses to devices in which a controller informs a first device of the IP address of a second device, as is recited in the limitations of Claim 1. Further, because the functions and operability of Khalil are predicated upon a fixed/static IP address of a mobile node, Applicants respectfully assert that the functions and operability of Pickett, when combined with Khalil, may be detrimental to the operation of Khalil.

Applicant further asserts that significant modification to the components, connections, programming, and interaction of and between components in Khalil are necessary so that Khalil could cooperatively operate with the functions and operability of Pickett, or vice versa.

Accordingly, Applicant respectfully asserts that the combining of Khalil with Pickett may be detrimental to the functions and operations of Khalil

and/or Pickett. As such, Applicant respectfully asserts that the combining of Khalil with Pickett is contra-indicated.

Therefore, Applicant respectfully asserts that nowhere does Khalil and Pickett, alone or in combination, suggest, teach or describe the claimed embodiments of the present invention as recited in independent Claims 1, 9, 18, 26, 36 and 42 and that these claims overcome the rejection under 35 U.S.C. 103(a), and that these claims are thus in condition for allowance. Further, Applicant respectfully asserts that nowhere does Khalil and Pickett, alone or in combination, suggest or teach the additional claimed features of the present invention as recited in Claims 2-8 that depend from independent Claim 1, Claims 10-17 that depend from independent Claim 9, Claims 19-25 that depend from independent Claim 18, Claims 27-35 that depend from independent Claim 18, Claims 37-41 that depend from independent Claim 36 and Claims 43-45 that depend from independent Claim 42. Therefore Applicants respectfully submit that Claims 2-8, 10-17, 19-25, 27-35, 37-41 and 43-45 overcome the rejection under 35 U.S.C. § 103(a), and are in a condition for allowance as being dependent upon an allowable base claim.

In light of the above amendments and remarks, Applicants respectfully request reconsideration of the rejected claims. Based on the amendments and arguments presented above, Applicants respectfully request that Claims 1-45 overcome the rejections of record and therefore, Applicants respectfully solicit allowance of these Claims.

It is believed that this application is now in condition for allowance. A notice to this effect is respectfully requested. Should further questions arise

concerning this application, the Examiner is invited to call Applicant's attorney at the number listed below. Please charge any shortage in fees due in connection with the filing of this paper to Deposit Account 50-3650.

Respectfully submitted,
3Com Corporation,

By _____

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